

**PUBLIC UTILITIES COMMISSION**

505 VAN NESS AVENUE



June 30, 2022

**Advice Letter 4568-G-B/6492-E-B**

Erik Jacobson  
Director, Regulatory Relations  
Pacific Gas and Electric Company  
77 Beale Street, Mail Code B10C  
P.O. Box 770000  
San Francisco, CA 94177

**SUBJECT: Determination of the revenue requirement associated with PG&E's 2022 Pension Trust Contribution.**

Dear Mr. Jacobson:

Advice Letter 4568-G-B/6492-E-B is effective as of February 03, 2022.

Sincerely,

A handwritten signature in cursive script, appearing to read "Pete Skala".

Pete Skala  
Interim Deputy Executive Director for Energy & Climate Policy, CPUC  
Interim Director, Energy Division, CPUC  
Director of Electric Supply, Planning and Costs, Energy Division, CPUC

March 7, 2022

**Advice 4568-G-A/6492-E-A**

(Pacific Gas and Electric Company ID U 39 M)

Public Utilities Commission of the State of California

**Subject: Supplemental: PG&E's Pension-Related Revenue Requirement for 2022**

**Purpose**

This advice letter submits minor corrections to the Gas Transmission and Storage (GT&S)-related pension revenue requirement assignments as provided in PG&E's original February 3, 2022 submittal. The correction relates specifically to the GT&S Natural Gas Storage Strategy (NGSS) assignments and results in an increase of ~\$58 thousand to the CFCA and a ~\$59 thousand decrease<sup>1</sup> to the NCA as provided in ~~strike through~~ and underline in the table on page 3 below.

The purpose of this Advice Letter is to establish Pacific Gas and Electric Company's (PG&E) authorized pension-related revenue requirement for 2022. By this submittal, PG&E does not propose any change to the pension contribution amount or any change to customers' rates.

**Background**

On January 8, 2018, the California Public Utility Commission's (Commission or CPUC) Energy Division issued PG&E a Disposition Letter<sup>2</sup> approving Advice Letter (AL) 3915-G/5195-E, which described required changes to the accounting for pension costs and the revised revenue requirement calculations necessary to conform to the accounting changes. The required change to accounting for pension costs had the effect of increasing the pension cost allocated to capital projects and decreasing the pension cost recorded as a current expense. AL 3915-G/5195-E provided for the submittal of a Tier 1 advice letter to revise the pension-related revenue requirements included in the functional base revenue balancing accounts (e.g., DRAM, PABA, CFCA, and NCA).

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<sup>1</sup> The CFCA and NCA amounts are slightly different due to rounding.

<sup>2</sup> [https://www.pge.com/tariffs/assets/pdf/adviceletter/GAS\\_3915-G.pdf](https://www.pge.com/tariffs/assets/pdf/adviceletter/GAS_3915-G.pdf)

PG&E has computed the 2022 revenue requirements associated with the 2022 pension contribution. The table below shows the pension related revenue requirements for 2020 through 2022 associated with the 2020, 2021 and 2022 pension contributions.

**PACIFIC GAS AND ELECTRIC COMPANY**

**Retirement Plan Contribution  
Revenue Requirement**

Line No	Year of Plan Contribution	Contribution Amount	Year of Revenue Requirement Calculation		
			2020	2021	2022
<b>Total Revenue Requirements (Millions of Dollars)</b>					
1	2020	327.000	103.656	29.508	29.775
2	2021	327.000		79.896	32.665
3	2022	327.000			84.259
4	Total	327.000	103.656	109.404	146.699
<b>Functional Revenue Requirements (Millions of Dollars)</b>					
		<b>O&amp;M Labor Factor</b>			
5	Elec Dist.	37.21%	38.570	40.709	54.587
6	Gas Dist.	21.64%	22.431	23.675	31.746
7	Gen	24.24%	25.126	26.520	35.560
8	Total GRC	83.09%	86.128	90.904	121.892
9	GT&S	10.53%	10.915	11.520	15.447
10	TOTAL CPUC Jurisdiction		97.043	102.424	137.340

The 2022 pension-related revenue requirement will be recorded effective January 1, 2022, in the functional base revenue accounts as follows:

Assignment to Base Revenue Accounts (Millions of Dollars)					
Function	Total	DRAM	PABA	CFCA	NCA
Elec Dist.	54.587	54.587			
Gas Dist.	31.746			30.609	1.136
Gen	35.560		35.560		
				<u>9.030</u>	<u>6.417</u>
GT&S	15.477			<u>8.972</u>	<u>6.476</u>
				<u>39.639</u>	<u>7.553</u>
TOTAL	137.340	54.587	35.560	<del>39.581</del>	<del>7.612</del>

Attachment 1 provides the Rolling Revenue Requirement Report for the General Rate Case functions updated for the 2022 pension revenue requirements. Attachment 1 is unchanged from the original submittal and can be found in AL 4568-G/6492-E.

Workpapers showing the computation of the 2022 pension-related revenue requirement are available upon request. This includes segmentation within the subaccounts of the NCA between Local Transmission-related allocation to customers not qualifying for G-NT-BB and G-EG-BB and for non-Local Transmission-related allocation applicable to all noncore customers.

The submittal would not increase any current rate or charge, cause the withdrawal of service, or conflict with any rate schedule or rule.

### **Protests**

Pursuant to GO 96-B, General Rule 7.5.1, PG&E requests to maintain the original protest and comment period designated in AL 4568-G/6492-E and not reopen the protest period.

### **Effective Date**

Pursuant to General Order (GO) 96-B, Rule 5.1, this advice letter is submitted with a Tier 1 designation. PG&E requests that this supplemental advice letter become effective concurrent with original Advice Letter 4568-G/6492-E, which is effective February 3, 2022.

**Notice**

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically to parties shown on the attached list and the parties on the service list for A.09-03-003 and A.21-06-021. Address changes to the General Order 96-B service list should be directed to PG&E at email address PGETariffs@pge.com. For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at Process\_Office@cpuc.ca.gov. Send all electronic approvals to PGETariffs@pge.com. Advice letter submittals can also be accessed electronically at: <http://www.pge.com/tariffs/>.

/S/

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Sidney Bob Dietz II  
Director, Regulatory Relations

cc: Service List A.09-03-003 and A.21-06-021



# ADVICE LETTER SUMMARY

## ENERGY UTILITY



MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.: Pacific Gas and Electric Company (ID U39 M)

Utility type:

- ELC       GAS       WATER  
 PLC       HEAT

Contact Person: Kimberly Loo

Phone #: (415)973-4587

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: KELM@pge.com

EXPLANATION OF UTILITY TYPE

ELC = Electric      GAS = Gas      WATER = Water  
 PLC = Pipeline      HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 4568-G-A/6492-E-A

Tier Designation: 1

Subject of AL: Supplemental: PG&E's Pension-Related Revenue Requirement for 2022

Keywords (choose from CPUC listing): Compliance

AL Type:  Monthly  Quarterly  Annual  One-Time  Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #:

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: No

Summarize differences between the AL and the prior withdrawn or rejected AL:

Confidential treatment requested?  Yes  No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required?  Yes  No

Requested effective date: 2/3/22

No. of tariff sheets: 0

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: N/A

Service affected and changes proposed<sup>1</sup>: N/A

Pending advice letters that revise the same tariff sheets: N/A

<sup>1</sup>Discuss in AL if more space is needed.

**Protests and correspondence regarding this AL are to be sent via email and are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:**

California Public Utilities Commission  
Energy Division Tariff Unit Email:  
[EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)

Contact Name: Sidnev Bob Dietz II. c/o Megan Lawson  
Title: Director, Regulatory Relations  
Utility/Entity Name: Pacific Gas and Electric Company  
  
Telephone (xxx) xxx-xxxx:  
Facsimile (xxx) xxx-xxxx:  
Email: PGETariffs@pge.com

Contact Name:  
Title:  
Utility/Entity Name:  
  
Telephone (xxx) xxx-xxxx:  
Facsimile (xxx) xxx-xxxx:  
Email:

CPUC  
Energy Division Tariff Unit  
505 Van Ness Avenue  
San Francisco, CA 94102

Clear Form

**PG&E Gas and Electric  
Advice Submittal List  
General Order 96-B, Section IV**

AT&T  
Albion Power Company

Alta Power Group, LLC  
Anderson & Poole

Atlas ReFuel  
BART

Barkovich & Yap, Inc.  
Braun Blasing Smith Wynne, P.C.  
California Cotton Ginners & Growers Assn  
California Energy Commission

California Hub for Energy Efficiency  
Financing

California Alternative Energy and  
Advanced Transportation Financing  
Authority  
California Public Utilities Commission  
Calpine

Cameron-Daniel, P.C.  
Casner, Steve  
Center for Biological Diversity

Chevron Pipeline and Power  
City of Palo Alto

City of San Jose  
Clean Power Research  
Coast Economic Consulting  
Commercial Energy  
Crossborder Energy  
Crown Road Energy, LLC  
Davis Wright Tremaine LLP  
Day Carter Murphy

Dept of General Services  
Don Pickett & Associates, Inc.  
Douglass & Liddell

East Bay Community Energy Ellison  
Schneider & Harris LLP  
Engineers and Scientists of California

GenOn Energy, Inc.  
Goodin, MacBride, Squeri, Schlotz &  
Ritchie  
Green Power Institute  
Hanna & Morton  
ICF  
International Power Technology

Intertie

Intestate Gas Services, Inc.  
Kelly Group  
Ken Bohn Consulting  
Keyes & Fox LLP  
Leviton Manufacturing Co., Inc.

Los Angeles County Integrated  
Waste Management Task Force  
MRW & Associates  
Manatt Phelps Phillips  
Marin Energy Authority  
McClintock IP  
McKenzie & Associates

Modesto Irrigation District  
NLine Energy, Inc.  
NRG Solar

OnGrid Solar  
Pacific Gas and Electric Company  
Peninsula Clean Energy

Pioneer Community Energy

Public Advocates Office

Redwood Coast Energy Authority  
Regulatory & Cogeneration Service, Inc.  
SCD Energy Solutions  
San Diego Gas & Electric Company

SPURR  
San Francisco Water Power and Sewer  
Sempra Utilities

Sierra Telephone Company, Inc.  
Southern California Edison Company  
Southern California Gas Company  
Spark Energy  
Sun Light & Power  
Sunshine Design  
Tecogen, Inc.  
TerraVerde Renewable Partners  
Tiger Natural Gas, Inc.

TransCanada  
Utility Cost Management  
Utility Power Solutions  
Uplight  
Water and Energy Consulting Wellhead  
Electric Company  
Western Manufactured Housing  
Communities Association (WMA)  
Yep Energy